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 ② ADMITTED IN CALIFORNIA
 ③ ALSO ADMITTED IN ARIZONA
 ④ ALSO ADMITTED IN CALIFORNIA
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 ⑯ ALSO ADMITTED IN WASHINGTON, D.C.
 ⑰ ALSO ADMITTED IN WISCONSIN
 ⑱ NOT ADMITTED IN WASHINGTON

January 16, 2015

Honorable Naomi Reice Buchwald
 United States District Court Judge
 USDC for the Southern District of New York
 500 Pearl Street, Room 2270
 New York, NY 10007

Re: *In re LIBOR-Based Financial Instruments Antitrust Litigation*, No. 11-md-2262
 & *Triaxx Prime CDO 2006-1 Ltd., et al. v. Bank of America Corp., et al.*, No. 14-cv-146

VIA ECF & HAND DELIVERY

Dear Judge Buchwald:

I write to request that the case captioned *Triaxx Prime CDO 2006-1 Ltd., et al. v. Bank of America., Corp et al.*, No. 14-cv-146 (the “*Triaxx Action*”) be formally included in the pending multi-district litigation proceeding *In re LIBOR-Based Financial Instruments Antitrust Litigation*, MDL No. 2262 (“*LIBOR MDL*”).

In early January 2014, after the *Triaxx Action* was removed to federal court, Defendants filed a Related Case Statement (Docket No. 2) indicating that this case was related to the *City of Baltimore Action* (No. 11-cv-5450) and should be included in the *LIBOR MDL*. The case was accepted as related to the *City of Baltimore Action* and was assigned to Your Honor.

We now understand from the Clerk’s office that the *City of Baltimore Action* has actually not been formally included in the *LIBOR MDL*, and hence the *Triaxx Action* is not part of the *LIBOR MDL*. As indicated by the Related Case Statement, the *Triaxx Action* raises similar issues to those raised by the other Direct Action Plaintiffs in the *LIBOR MDL*. The *Triaxx Action* is subject to some of the omnibus motions to dismiss filed by Defendants in the *LIBOR MDL*, and *Triaxx* has joined the omnibus opposition briefs filed by Direct Action Plaintiffs.

Naomi Reice Buchwald
January 16, 2015
Page 2

KELLER ROHRBACK L.L.P.

In light of this, we respectfully request that Your Honor issue an order directing that the *Triaxx* Action be marked as related to the LIBOR MDL, and directing the Clerk of Court to make such docket entries as are appropriate to create an association between the *Triaxx* Action and 1:11-md-02262-NRB. We have consulted with Defendants in the *Triaxx* Action and they support this request.

Sincerely yours,

s/ David S. Preminger

David S. Preminger

Counsel for the Triaxx Plaintiffs

DSP:dk